



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
NEW YORK REGIONAL OFFICE  
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March 26, 2019

Via ECF

Hon. Jose L. Linares, Chief Judge  
United States District Judge  
U.S. District Court, District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: **SEC v. DelPresto, et al.; 15-CV-8656 (JLL)**

Dear Judge Linares:

We represent Plaintiff Securities and Exchange Commission ("Commission") in this action. We enclose for the Court's consideration courtesy copies of partial Judgments on consent against Defendants DelPresto and his entity, MLF Group LLC, by which those Defendants have consented to the imposition of injunctive relief against each of them, leaving the resolution of the Commission's claims for monetary relief to resolution by further consent or motion. If the partial Judgments are satisfactory to the Court, we respectfully request that the Court docket each Judgment with its respective consent.

With respect to Defendant Toomer, the criminal action against him has now been fully resolved, and the Stay in this matter should be lifted to permit the Commission's claims against him to go forward, pursuant to the Stipulation and Order entered December 4, 2017 (DE 36.) Under the terms of that Stipulation and Order, Defendant Toomer's answer is due 30 days after March 20, 2019. (See United States v. Toomer, 17 Cr. 0193 (D. Nev.) (DE 111 (Order Dismissing Indictment).) The Commission respectfully requests that the Court set a date for a Scheduling Conference as soon after Toomer's answer is due as practicable, so that the parties may begin discovery.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nancy A. Brown", with a stylized flourish at the end.

Nancy A. Brown

Enclosures  
cc (via email):

Magistrate Judge Arpert

December 1, 2017

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John D. Arsenault, Esq.  
(Counsel for Defendants Samuel DelPresto and MLF Group, LLC)  
Amy Luria, Esq.  
(Counsel for Defendant Donald Toomer)